In The United States District Court
For The Western District of Pennsylvania Flounty, Civil action No! Patricia A. Dott, RECEIVED It mority Security OCT 2 8 2022 Derwices the CLERK, U.S. DISTRICT COURT FOR THE WESTERN DISTRICT Defendant.

U) Patrucio A. Docott reado at 1842

Washington Stroot; #304 Phone Number

H12-980-4399 Haidelberg Lennsylvania OF PENNSYLVANIA 15106. Unc, Phone Number 412-885-8654, Corporate office Address, 4600 Clairton Bouleward, Pittsburgh, PA 15236. (3) 2000 12182 Public Accommodations Wolations.
(4) Defendants (Name) St. Moritz Dicinity Denuicers. Inc is under, the Latus of the Statost Pennoywania

and has its principal place of Business in Pittsburgh. (5). Violations of Ilth 42 U.S. Code 1218201 Public accommodations, (6). Ever Dince, plainty how been confined to her mobilized wheelchour she have limitations on her physical ac-Inuties. Due Time, che made request for public accommodations but the Decurity Check point gleard become Extremely nostile twood plannty and the trew the security wheck point boint of not her was there, ony damonges done to her wheechour. Thorwayter, She has been deriled access to public accommodations Lecoulathe Decurity Check Point Counter Top is too right and to Very afficult for her to reach.

from ner Wheel chour. I bainty contacted the downtown shorings department! A Oherry deputy enforced the vaw for the basker to We would but the quickly perkit away. Afterwards, she gett discompant in per body. Incurrently Decurity guards
began retainations against Flaintys
who contacted the downtown aperious
department against but their time Die was informed that the Shorifto depart ment didn't have any jurisdiction the stated that plaintiff reeded and Disability Discrimation (i). attorney 7. On August 15,2022, Ohr entered into the City County Building Located at 414 Drant Stroet, Pittaburgh, PA 15219. Thereafter, when it was her

turn the immediately detect vias against a disabled victor. The Decurity Check point Counter top in too high for her to place her personal belongings include of the Decurity backet. Plainty made seveval requests for the on duty occurity Checkpoint quara to please Lower tre basker to accommodate her but intend, of appeating a senior citizen who is mandicapped the security quard made un recordate de mando por plaintiff to reach the warket by herself to puther own items inside of it, she check point Decivily guard was vary disreapectful and Lamber.

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Disability Discrimation (i)

8. Once against on Deptember is
2022, plainly entered into the City
2022, plainly entered into the City
Courty Building becaled at 414 Grant
Courty Building becaled at 414 Grant
Theoret Pitteburgh, PA 15219, Fylten that
Time, one made a nequest for Fullic
Discommodation, The onduty Decurity
Guard decined to Lowered the Decurity
Check baspet To help plainly place her
personal belongings incide of the Decurity
Check point baspet.

Discrinity Discrimation (111)

9. One more time on October 3, 2022, plaintiff entered into the city (surty Building
tiff entered into the city (surty Building
toparted at 414 Grant Itreet,
located at 414 Grant Itreet,
Pittaburgh, PA 15219, Ite Security
Pittaburgh, PA 15219, Ite Security
Check fount Counter top is high and
with the basket placed on it plaintiff
with the basket placed her personal
Lelongings inside of it.

The entreated the elevity check foint quand to give her a neight hand but appropriate let down to her hand reach so the would ve placed her personal belongings incide of the Decurity check backet.

10, These disabilities discrimiations occurred when plainty was physical unable to reach the high Decurity Check point baskex to place her present baskex to

Place ver personal belongings in-Dide of it. And the warrit permitted to use ADA customero Darwices Lower

Decurity basket por disabled person

that, but she is a Depier witigen who lorrandecapped. Themiar, the war also

deprived of using fublic accommodations. Additionally, whetreated differently from viotors that was Dianding and Walking. Plus, was repeatedly narassod. Furthermore, who was rebuted by the security check points guards. On top of that, plain,—tiff was emotional and verbal abused, Ditle 42 U.S. Code 12.182-Propulition of discriminationly. Public accommodations

11. Purpuanto 42 U.S. Code 12182 (a) (B)
(a) Hereral Rule, No individual Drall be
discriminated against on the basis of disshility in the full and equal enjoyment
of the good, Dervices, facilities, primileges,
assuming es, on alcommodation by any
person who owns, leaves for leaves to) or
operates a place of public accommodation.

Purpuant to 42U.S. Code 12182from Lition of discrimination by public accommodation. (B7-Integrated Detting, Hood, Dervices, facilities, Privileges, advantages, and accommodation Drall be afforded to an individual with a disability in the most integrated setting appropriate to the needs of the individual.

airability Discrimation (i)

17. On August 15, 2022, plainty entered into the city County Building Located at 414 Hrand Street, Pittaburgh P 15219, Iheroafter, when it was not two Dho immediately detect blas against a disabled vistor. The Decurity Check point counter top is high for, nen to place her personal belongings incide of the Decurity Lasket.

to the on duty Decurity chark point guard to please when the baster to excommodate her but intend, of addicting a denier Citizen who is tradicional unreadable demands for plantiff to neach the basket by nevery to put her own thems would of it. The Check point Decurity quard was was very disrespectful and Lamber.

Disability Discrimation (ii)

Building to cated at 414 Hrand Street, Photosty Photosty After that time the place of the accountry made a tregular for public accommodation. The on duty security quard decrined to lowered the security check taken to help plannliff place has

Personal belongings inside of the Decurity check point basket. Disability Discrimation (111) 14. One more time, on October 3, 2022, plainty entered into the city County Building Located at 414 Krant Street, Pittoburgh, PA15219, The Decurity check point counter top to high and With the backet placed on it plaintly was Physically unable to place her . Hersonal belongings inside of It. point guard to give nora helping nond but she refused to let it down to har hand reach so she would'us placed var personal berongings incide of it. And she wasn't permitted to word Derwices lower Decurity vasket for a disabled per-Don.

15, ALTO, Dhe was reprimand and The was verbally attached. Notonly that out she was serior citizen who is tranducapped. Likewill shewas also deprived of voing public accommodations. Additionally, Dre was treated duperently from vistors that was standing and walking Plus, she Mas repeatedly rarappeld. Further-more shower rebuted by the security check point guards. On top of that, plainty was emotional and verbal Obulla,

Age Discrimination
16 Plaintiff is a elderly person! She
nowed physical impairment, more than
that, she was treated unpairly secouse
of her age, which is another wishation
of Pennsylvania elderly aluse
law, the was out ject to an adverse
age action; that Dub Startially

younger persons was not yelled at not were they harassed. Flown-Up believe she was sought out from which who was deprivation; of using Rublic accommodations; that whe was a qualified wheelchair bound customer to use the lower AD A security check point basket to place her person at belongings include of the which who was rejected.

Purplicant to U.S. Code 12182 Prohibition of discrimination by Public accommodations

17. (a) General Rule

No individual part Sediscriminated against

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on the Garls of dirability in the full and egilal

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priviles, advantages, on accommodation

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of any place of public accommodation

by any person who suno, leases (or leases

by any person who suno, leases (or leases

to, or operates a place of public

accommodation, (b). Construction (1). General Prohibition (A) Activities (1). Derial of participation It shall be discreminatory to Deliper an individual or class of individuals on the bases of dieabilities or disabilities of such individual on class, directly, on through contractual, licensing on other arrangements with the opportunit to patricipate in orbenefit from agood, Service, pacility, Primitage, advantage, or accommodation that is not equal to that appoinded to others individuals.

(iii) Expanded Lenghit, et show be discriminatory to provide On individual on closer of individuals, on the basis of a disabitity on dissilities

of such individual or class, directly or through contractual, excensing, or other arrangement with a good services facility privilege, advantage as accommodation that is different or reparate from that provided to other individual, unless such action to necessary to provide the individual or class of individuals With good Derwice facility, privilege, advantage or commodation on other sporwity that to as effectives as that provided strans.

Plainty Deek revier for a Lother atternate Special design Customero Derwiceo ADA Courtos top to accommodate wholehows usars to be inside the city burty Building located at 414 Mant Street, Pittsburgh, FA 15219. Plainty Deek relief for the st monity Derwices Ino, Decurity Check point guardets
restrains from there discrimi
Notory perjudical treatments
Toward guest With Physical
imposirments.

Conclusion

Accordingly, for all of the forgoing reasons, plaintiff revierence request that this Court grant her pray for relief and such others reliefs that this Court deems to be appropriate in her civil Complain. Espectfully Dubmitted atrucia A Denti "Prose"

1842 Machington Stratt-304 Heidelberg, PA15106 H12-980-4399 Dated Ron October 14,2022 By: Patricio A. Doeth uproson